

EXHIBIT 2

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA

BABY DOE, et al.,

Plaintiffs,

v.

Civil Action No.

3:22cv00049-NKM-JCH

JOSHUA MAST, et al.,

Defendants.

Video-recorded Deposition of

JONATHAN MAST

Monday, July 17, 2023

9:33 a.m.

Charlottesville, Virginia

Reported by: Mark E. Brown, RPR

1 today please send 5K via ACH to Jonathan Mast." Do
2 you see that?

3 A Yes, sir.

4 Q Did you receive \$5,000 from the Pipe Hitter
5 Foundation on or after May the 19th?

6 A After, yes, sir.

7 Q Do you recall when the money came in?

8 A I think it was about five or six days.

9 Q So May the 19th was a Friday. Would it
10 have been some time in the following week?

11 A Yes, sir, I think that's right. There was
12 a small delay where I had to follow up and they said
13 that there was some kind of error on their end but I
14 think that's about right.

15 Q And do you identify that account
16 information on Exhibit 6 to be for your personal bank
17 account?

18 A I believe it is. I don't have the numbers
19 memorized but I believe it is.

20 Q I looked up the routing number. It is for
21 the First National Bank in Altavista. Is that where
22 you bank?

23 A That's me.

24 Q Is that account in your name only?

25 A Me and my wife.

1 Q And you understood that the money was
2 coming to you and to your First National Bank account
3 from the Pipe Hitter Foundation in furtherance of the
4 grant agreement that you had signed on May the 10th,
5 right?

6 A Yes, sir.

7 Q And what did you do with the \$5,000?

8 A I forwarded it to my brother.

9 Q How did you do that?

10 A Check.

11 Q Same day? Soon after you got the money?

12 A Soon after.

13 Q You send all \$5,000 to your brother?

14 A No. I -- this is the instance where I had
15 reimbursed myself a thousand because I had loaned him
16 a thousand.

17 Q You had advanced him a thousand so then you
18 kept a thousand of the five?

19 A Uh-huh.

20 Q And sent the four to him?

21 A Correct.

22 Q Has the Pipe Hitter Foundation sent more
23 money to you since this initial installment of
24 \$5,000?

25 A No, sir.

1 A Yeah, I was aware of that.

2 Q So do you know that the Pipe Hitter
3 Foundation not only posted what we see here in
4 Exhibit 13 to its web page but also pushed out an
5 email to its members?

6 A That was initially discussed as a
7 possibility but it never -- it was not discussed
8 afterwards, but I assume that was probably the case,
9 yes.

10 Q So you don't know one way or the other what
11 else the Pipe Hitter Foundation did with this
12 information other than what we see in Exhibit 13?

13 A Correct. I never received the email
14 publication, I don't think.

15 Q Do you recall, Mr. Mast, sending an email
16 to Dena Cruden on May the 17th asking if Joshua could
17 use Pipe Hitter Foundation grant money for basic
18 living necessities?

19 A I think I did. I don't know about the date
20 but I remember having a conversation with her at some
21 point along those lines.

22 MR. POWELL: Let's mark this 14, please.

23 (Mast Deposition Exhibit No. 14 was marked
24 for identification and attached to the
25 transcript.)

1 BY MR. POWELL:

2 Q Mr. Mast, you have in front of you
3 Deposition Exhibit 14 which you will see is an
4 exchange of text messages between you and Ms. Cruden
5 starting with your initiating text there at the top
6 of the first page, Wednesday, May 17, where you text
7 her, quote, "Would you have time to talk for a few
8 moments regarding funds raised being distributed to
9 my brother," close quote. Do you see that?

10 A I do.

11 Q And then you go on in the next paragraph to
12 say that he had -- he Joshua had confided in you that
13 he was out of money and was praying for a miracle,
14 and you were wondering if some of the Pipe Hitter
15 funds could be used -- you will see there in the
16 third-to-the-last line -- quote, for basic living
17 necessities. Do you see that?

18 A I do.

19 Q Tell me what you remember about your
20 conversation with Dena about this subject.

21 A I remember talking to her that I was -- I
22 had at some point talked to my brother, I don't
23 remember when, but he had said that things were
24 pretty tight financially and told me a little bit
25 about that and that was the end of the conversation.

1 A Yes. Most of the information came from him
2 at the time that it occurred, correct.

3 Q So during this time frame, April and May of
4 2023, Joshua knew you were in touch with the Pipe
5 Hitter Foundation, correct?

6 A Yeah, I had told him that I had decided to
7 touch base with them and partner with them.

8 Q Did he know in advance that you were going
9 to be interviewed by One America News?

10 A No, he did not.

11 Q Why didn't you tell him?

12 A I purposely didn't tell anyone in my family
13 because there has been a lot of, oh, politely put,
14 negative media coverage of my family and I didn't
15 want any repercussions to go to anybody else but me.

16 Q Were you aware on June 28th Joshua and
17 Stephanie's lawyers filed in the federal court case
18 something called a memorandum in opposition to
19 Plaintiffs' motion to show cause?

20 A Yes, I think so. Is that where the cease
21 and desist letter gets filed with the complaint, my
22 brother's attorney filed their response to that?

23 Q Let's back up a little bit. This is not a
24 memory quiz for you and I'm not asking you to
25 recreate what's in the court file.

1 MR. FRANCISCO: Objection. This document
2 speaks for itself. It's a legal pleading not by
3 Jonathan.

4 BY MR. POWELL:

5 Q Let me ask it another way. You testified
6 just a few minutes ago that Joshua knew you were in
7 touch with the Pipe Hitter Foundation in April and
8 May of this year, correct?

9 A Well, yeah, because he had to know how I
10 was sending him \$5,000 or \$4,000.

11 Q And you knew that he was in touch with the
12 Pipe Hitter Foundation because he told you that
13 someone from the Pipe Hitter Foundation was going to
14 reach out to you. That's the text message that you
15 had the initial contact with Dena on April the 9th.

16 A Sure. And I believe somewhere in this
17 document says he had been put in touch with the Pipe
18 Hitter and told them he couldn't work with them and
19 that's why he directed them to another member of the
20 family.

21 Q Right. So you were then in contact
22 intermittently in April and May with the Pipe Hitter
23 Foundation and Jonathan (sic) knew about that, didn't
24 he?

25 A Joshua. Yes.